

North Carolina Department of Environment and Natural Resources

Dexter Matthews, Director

Division of Waste Management
Solid Waste Section
Winston-Salem Regional Office

Beverly Eaves Perdue, Governor Dee Freeman, Secretary

June 25, 2010

Jeryl W. Covington, P.E. Director, Environmental Services City of Greensboro PO Box 3136 Greensboro, NC 27402-3136

Re: Closure of Portions of the Construction and Demolition (C&D) area

White Street Landfill, Permit # 41-03

Dear Ms. Covington,

The Solid Waste Section has reviewed the June 14, 2010 response submitted to this office by you regarding the status of waste placement in the C&D area of the White Street Landfill. The purpose of the response was to provide information requested in the May 19, 2010 audit report to determine the need for closure in accordance with 15A NCAC 13B .0543(c)(5).

15A NCAC 13B .0543(c)(5) states "the owner and operator must begin closure activities for that portion of each C&DLF unit meeting one or more of the following requirement....

- (b) No later than 30 days after the date that a 10 acre or greater area of waste, is within 15 feet of final design grades: or
- (c) No later than one year after the most recent receipt of wastes, if the C&DLF has remaining capacity."

Based upon observations made by Section staff during the May 19th facility audit and the information provided in the June 14th response, it appears that the facility is not in compliance with the above noted rule in that substantially more than 10 acres are within 15ft of final design grade and those areas have not received waste within the last year, only receiving minor amounts of soil needed for the maintenance of the cover. Therefore, by **August 15, 2010** submit a plan of action, including a schedule, to address the closure of any area at final grade and/or within 15ft of final grade to:

Hugh Jernigan
NCDENR - Division of Waste Management
Solid Waste Section
585 Waughtown Street
Winston-Salem, NC 27107

585 Waughtown Street, Winston-Salem, NC 27107

Phone: 336-771-5000 \ FAX: 336-771-4631 \ Internet: www.wastenotnc.org

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The permit for this facility is currently under review and cannot be renewed if the facility is in violation of any law and/or rule. Therefore, it is important that action be taken immediately to address this matter. In addition, being that the permit is under review, it is my understanding that any submittals made at this time would be reviewed under the same permitting fees and would thus save the City additional costs to submit at a later date.

Should you have any questions or concerns, please contact me at (336) 771-5092.

Jason M. Watkins

Central District Supervisor

Jon M. Mass

Field Operations

Cc (via email only):

Mark Poindexter, Field Operations Branch Head Hugh Jernigan, Environmental Senior Specialist Donald Herndon, Compliance Officer Ed Mussler, Permitting Branch Head Ming Chao, Permit Engineer